

Exhibit

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

CASE NO.: 1:24-cv-00779-JPH-MKK

MAX MINDS, LLC,

Plaintiff,

vs.

TRIANGLE EXPERIENCE GROUP, INC., INC.,
ROBERT EDWARD CLARE, JEFFREY MASE,
KEVIN G. MULLICAN AND JOHN DOES 1-10,

Defendants.

REMOTE VIA ZOOM DEPOSITION OF JEFFREY MASE
TAKEN ON BEHALF OF THE PLAINTIFF
Remote Via Zoom
December 4, 2024
10:00 a.m. to 11:59 p.m.

REPORTED BY
MARLA SCHREIBER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA

1 requirement.

2 BY MR. ROTHMAN:

3 Q Okay.

4 A Over the course of our relationship, these
5 requirements have been in constant flux.

6 Q Okay. Well, does this certification
7 agreement set forth certain requirements under now
8 therefore numbers one, two, three, does set forth
9 certain requirements concerning the transfer of source
10 code?

11 MR. DELANEY: Objection to the form.

12 BY MR. ROTHMAN:

13 Q You can answer.

14 A That's what it appears to be.

15 Q Okay. And you were aware that there were
16 requirements that TEG was supposed to follow concerning
17 source code transfers?

18 A Yes, there were a number of conditions over
19 a period of a couple of years, yes.

20 Q Okay. So there may or may not be a
21 document there marked Exhibit 35, but I tend to think
22 no. But let me share my screen so you can see the
23 document that I am going to refer to.

24 So do you see the top half of this document
25 called Evidence/Property Custody Document, Exhibit 35?

1 Mr. Bowers certified?

2 A I do not. I wasn't involved in that
3 process.

4 Q Do you know if TEG ever retained source
5 code that it received from my client that it
6 simultaneously or subsequently thereafter certified
7 that it had destroyed?

8 A I do not. Can you repeat that question?

9 Q Sure.

10 MR. ROTHMAN: You want to read that back,
11 Ms. Schreiber?

12 (Court Reporter Read Back.)

13 THE WITNESS: No.

14 BY MR. ROTHMAN:

15 Q Does TEG currently have source code for any
16 version of Haptic Federal developed by Max?

17 MR. DELANEY: Object to the form of the
18 question. You can answer.

19 THE WITNESS: The co-developed co-created
20 software we currently have Haptic.

21 BY MR. ROTHMAN:

22 Q Where is that software source code?

23 A I have to refer to specific --

24 MR. DELANEY: You have to restate the
25 question. It came in jumbled.

1 his attitude for sure.

2 Q Okay. Well, we have a disagreement about
3 that. But as long as we both understand what that
4 disagreement is, we can move forward with the
5 deposition.

6 So my question is, when was it that TEG
7 first received my client's source code and then
8 retained the source code not destroyed?

9 MR. DELANEY: Objection to the form of the
10 question. Calls for a legal conclusion.

11 BY MR. ROTHMAN:

12 Q You can answer.

13 A I would break your question into two parts.

14 Q Sure.

15 A We first received the software that we were
16 co-developing in July, approximately of 2020.

17 The second part of your question, I don't
18 know the answer to that.

19 Q Okay. So do you understand the difference
20 between source code and what you are referring to as
21 software?

22 A I know what source code is, yes.

23 Q Okay. So my question refers to source
24 code. And the question is when did TEG first receive
25 source code from my client?

1 document, right?

2 A Yes. Appears to be.

3 Q All right. So you have seen these and been
4 involved in these source code exchanges and
5 certifications of destruction, right?

6 A Yes.

7 Q Okay.

8 A In this instance I was.

9 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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[REDACTED] [REDACTED]

[REDACTED] [REDACTED]